

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

JANE DOE
Plaintiff

VS.

EDINBURG CONSOLIDATED
INDEPENDENT SCHOOL DISTRICT
Defendant

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CIVIL ACTION NO. 7:19-CV-00309
(JURY REQUESTED)

**DEFENDANT'S EDINBURG CONSOLIDATED INDEPENDENT SCHOOL DISTRICT
RESPONSES TO PLAINTIFF'S SECOND SET OF REQUEST FOR PRODUCTION**

To: Plaintiff by and through her attorney of record:

Anthony G. Buzbee
Cornelia Brandfield-Harvey
The Buzbee Law Firm
600 Travis, Suite 7300
Houston, Texas 77002

COMES NOW, EDINBURG CONSOLIDATED INDEPENDENT SCHOOL DISTRICT, Defendant in the above-styled and numbered cause and pursuant to Rule 196 of the Texas Rules of Civil Procedure attached hereto makes the following responses and objections to Plaintiff's Second Set of Request for Production. Defendant reserves the right to supplement, modify or amend the information provided below.

Signed on **January 17, 2020.**

Respectfully submitted,

ESPARZA & GARZA, L.L.P.

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By: /s/ Eduardo G Garza

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on **January 17, 2020**, a true and correct copy of the foregoing **Defendant's Edinburg Consolidated Independent School District Responses to Plaintiff's Second Set of Request for Production** has been served on all attorneys of record as noted below:

Via Regular Mail

And E-Mail

Anthony G. Buzbee

Cornelia Brandfield-Harvey

The Buzbee Law Firm

600 Travis, Suite 7300

Houston, Texas 77002

Via E-mail and

Regular Mail

Aaron I. Vela

Law Office of Aaron I. Vela, P.C.

200 East Cano

Edinburg, Texas 78539

By: /s/ Eduardo G Garza

Eduardo G Garza

**SECOND REQUESTS FOR PRODUCTION TO
DEFENDANT EDINBURG CISD**

23. Please produce the personnel file for Noemi Vela.

RESPONSE:

Defendant objects to this request as seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Defendant further objects to this request as seeking to invade the personal privacy rights of Defendant's employee or former employee.

24. Please produce the personnel file for Jesus Angel Sanchez.

RESPONSE:

Defendant objects to this request as seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Defendant further objects to this request as seeking to invade the personal privacy rights of Defendant's employee or former employee.

25. Please produce the personnel file for Rosa Maria Bernal.

RESPONSE:

Defendant objects to this request as seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Defendant further objects to this request as seeking to invade the personal privacy rights of Defendant's employee or former employee.

26. Please produce the personnel file for Alyssa Ramirez.

RESPONSE:

Defendant objects to this request as seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Defendant further objects to this request as seeking to invade the personal privacy rights of Defendant's employee or former employee.

27. Please produce all records pertaining to the investigation of Miguel Condes for the sexual assault of a minor student from Harwell Middle School in 2013.

RESPONSE:

Defendant objects to this request as seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Defendant further objects to this request as seeking to invade the personal privacy rights of Defendant's students and would potentially call for a violation of FERPA by Defendant.

28. The affidavit provided to Ms. Culberson and/or an officer regarding Badillo's inappropriate conduct towards another female student in 2017.

RESPONSE:

None